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Southern California Edison
2017 ERRA Forecast A.16-05-001

DATA REQUEST SET A1605001 PAC-SCE-01

To: PAC
Prepared by: Russell Archer
Title: Senior Attorney
Dated: 05/10/2016

Question 01-03:

1. Please describe the possible impact of the SONGS OII Ruling (and more specifically, a decision flowing from the ruling) on SCE's 2017 forecast ERRA application.
2. Under Article V of the 2015 ERRA settlement agreement, it appears that SCE may only terminate the agreement if SCE has provided written notice to other parties by May 1, 2016.
 - a. Has SCE provided written notice to other parties of SCE's intention to terminate the 2015 ERRA settlement agreement?
 - b. Does SCE expect to provide written notice to other parties of SCE's intention to terminate the 2015 ERRA settlement agreement?
 - c. Does SCE agree that, if SCE has not provided written notice by May 1, 2016 of its intention to terminate the 2015 ERRA settlement agreement, SCE is unable to do so now because the May 1, 2016 date has passed? If not, please explain SCE's position.
3. Under Article V of the 2015 ERRA settlement agreement, the following statement is made: "The Parties further agree that, if this Settlement Agreement is terminated in accordance with the terms of this paragraph, the disposition of the current and future Net Energy Crisis Refunds with respect to DA customers shall be litigated and/or otherwise addressed in SCE's then-pending ERRA Forecast proceeding." In light of this provision, does SCE expect to re-litigate the Net Energy Crisis Refunds in the 2017 ERRA forecast application? If so, please explain.

For context, I have attached two documents (D.15-10-037, approving the 2015 ERRA settlement agreement; and the recently issued SONGS OII Ruling).



SONGS Reopening Ruling.PDF



D.15-10-037 (Approving Settlement Agreement).pdf

Response to Question 01-03:

1. It would be speculative to describe any “possible impact” that the Commission’s potential actions on the SONGS OII Ruling would have on SCE’s 2017 ERRA Forecast application.

2.a. No.

2.b. No.

2.c. SCE agrees that Article V of the 2015 ERRA Forecast settlement provides for termination based on notice of a Material Adverse Event given prior to May 1, 2016. SCE reserves all rights to advocate for an adjustment to ratemaking on any other grounds.

3. No.